

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE,

Plaintiff,

CIVIL ACTION FILE NO.:

v.

1:20-CV-02817-ELR

MOREHOUSE SCHOOL OF
MEDICINE, DR. VALERIE
MONTGOMERY RICE, DR. NGOZI
ANACHEBE, MARLA THOMPSON,
AND JOHN DOES 1-25.

Defendants.

MOTION FOR ADDITIONAL TIME TO RESPOND TO COMPLAINT

Come now Defendants Morehouse School of Medicine, Dr. Valerie Montgomery Rice, Dr. Ngozi Anachebe, and Marla Thompson (hereinafter “Defendants”), by and through counsel of record, and file this Motion for Additional Time to Respond to the Complaint. In support of this Motion, Defendants state as follows:

1. Plaintiff filed the Complaint on July 6, 2020. (Doc. No. 1.)
2. Defendants response to the Complaint is due on or before December 18, 2020. (Doc. No. 19.)
3. The Parties are actively working to resolve the claims in this litigation and desire more time to work through a potential settlement of the allegations in this case prior to Defendants filing a response and the parties engaging in

discovery. The Parties are also actively discussing the potential dismissal of the individual defendants.

4. Therefore, on December 17, 2020, before Defendants response to the Complaint was due, the Parties filed a Joint Motion to stay all proceedings in this action for a period of 90 days, up to and through March 17, 2021.

5. In the Joint Motion, Defendants also requested time through fourteen (14) days after the stay ends to file their response to the Complaint.

6. Out of an abundance of caution and in the event the Court does not grant the motion to stay, Defendants are now filing this separate Motion for Additional Time to Respond to the Complaint and seeking 21 days to file its response to the Complaint, or until January 8, 2021. Defendants seek this time so that the Parties may work through settlement of the claims in this case and the court may consider the motion to stay. If the parties' settlement efforts are unsuccessful, Defendants will file a response to the Complaint by the stated deadline.

7. Plaintiff has agreed to an extension so that the parties may work through settlement as reflected in the joint motion to stay.

8. This Motion is not made for the purpose of delay but so that justice may be served and so that the Parties may attempt, in good faith, to resolve the issues in this case. Given the nature of this Motion, Defendants request that they

are relieved of the requirement of filing a supporting memorandum. A Proposed Order has been filed concurrently with this Motion.

Respectfully submitted this 22nd day of December, 2020.

By:

/s/ Tanisha Pinkins
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*Attorney for Morehouse School of Medicine,
Inc., Dr. Valerie Montgomery Rice, Dr.
Ngozi Anachebe, and Marla Thompson*

CERTIFICATION OF FONT

I hereby certify that the foregoing document has been prepared in 14-point Times New Roman font and complies with Local Rule 5.1(C) and 7.1(D), NDGA.

This 22nd day of December, 2020.

/s/ Tanisha Pinkins
TANISHA PINKINS

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing *Motion for Additional Time* with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

This 22nd day of December, 2020.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

/s/ Tanisha Pinkins
TANISHA PINKINS
GA Bar No. 686450

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